# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	Criminal No. M-19-1197-1
	§	
HECTOR ABEL GUERRA	§	

## **UNOPPOSED MOTION FOR CONTINUANCE**

### TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, HECTOR ABEL GUERRA, Defendant in the above-styled and numbered cause, and files this his Unopposed Motion for Continuance and, as grounds therefore, would respectfully show unto the Court the following:

I.

This case is set for a Final Pretrial Conference on Friday, August 30, 2019 at 9:00 a.m. and Jury Selection on Wednesday, September 4, 2019 at 9:30 a.m. in McAllen, Texas before this Honorable Court.

II.

The undersigned attorney was just substituted as attorney of record of counsel until yesterday and needs additional time to meet with Defendant and review the file.

III.

The undersigned has conferred with Assistant United States Attorney Mr. Robert Wells and he is unopposed to this Motion for Continuance.

This Motion for Continuance is not made for delay only, but in the interest of justice.

WHEREFORE, PREMISES CONSIDERED, Defendant, HECTOR ABEL GUERRA prays that the hearing be continued for a later date.

Respectfully submitted,

G. ALLEN RAMIREZ ATTORNEY AT LAW 515 East 2<sup>nd</sup> St. Rio Grande City, TX 78582 Tele: (956) 487-4585 Fax: (956) 487-0565

BY: /s/G. Allen Ramirez
G. ALLEN RAMIREZ
State Bar No. 16501800
Federal I.D. No. 7762

### **CERTIFICATE OF CONFERENCE**

This is to certify that counsel for the Defendant has consulted with the Assistant United States Attorney and with attorneys of record for other Defendants and they are:

Robert Wells, Jr.

(Counsel for USA)

unopposed

Fabian Guerrero

(Counsel for Julio Cesar Escamilla)

unopposed

\_\_/s/G. Allen Ramirez G. ALLEN RAMIREZ

### **CERTIFICATE OF SERVICE**

I, hereby certify that on this the 27<sup>th</sup> day of August 2019 a true and correct copy of the foregoing *Unopposed Motion for Continuance* was forwarded to the following parties:

Robert Wells, Jr. Assistant U.S. Attorney 1701 W Bus Hwy, Ste 600 McAllen, TX 78501 Via-Electronic Mail

/s/G. Allen Ramirez
G. ALLEN RAMIREZ